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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

**DECLARATION OF MATTHEW
MONTGOMERY IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**

I, Matthew Montgomery, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am Of Counsel for the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in In re Facebook, Inc. Consumer Privacy User Profile Litigation, Case No. 18-md-02843-VC-JSC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them.

3. In accordance with Civil Local Rules 79-5(d)(1)(A) and (e), this declaration is made in support of Plaintiffs’ Administrative Motion to File Under Seal:

	Document	Portions Sought to be Sealed
1	Discovery Letter Regarding Plaintiffs’ Request for Production No. 43 (“Discovery Letter”)	Parts of the second and third full paragraphs on page two of the Discovery Letter.
2	Exhibit F	The 3 pages comprising Exhibit F, an excerpt consisting of Bates Numbers FB-CA-MDL-00009462, 9466, and 9467 from a document produced by Facebook Bates Numbered FB-CA-MDL-00009455-9501, to the Discovery Letter designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.
3	Exhibit G	The 1 page comprising Exhibit G, an excerpt consisting of Bates Number FB-CA-MDL-00013451 from a document produced by Facebook Bates Numbered FB-CA-MDL-00013451-13457, to the Discovery Letter designated by Facebook, Inc. (“Facebook”) as “Highly Confidential – Attorneys Eyes Only” pursuant to the Protective Order.

4. Attached hereto as **Exhibit 1** is a redacted version of Plaintiffs’ Discovery Letter.

5. Attached hereto as **Exhibit 2** is an unredacted version of Plaintiffs’ Discovery Letter.

6. Attached hereto as **Exhibit 3** is Exhibit F to Plaintiffs' Discovery Letter in unredacted form. Pursuant to Civil Local Rule 79-5(d)(1)(C), a redacted version of Plaintiffs' Submission is not required as the Plaintiffs seek to file the entirety of this document under seal.

7. Attached hereto as **Exhibit 4** is Exhibit G to Plaintiffs' Discovery Letter in unredacted form. Pursuant to Civil Local Rule 79-5(d)(1)(C), a redacted version of Plaintiffs' Submission is not required as the Plaintiffs seek to file the entirety of this document under seal.

8. Plaintiffs seek to file portions of the Discovery Letter under seal because some of the information contained in the Discovery Letter contains or summarizes information that Defendant Facebook has designated "Highly Confidential – Attorneys Eyes' Only" pursuant to the Stipulated Protective Order, Dkt. No. 122, entered in this Action.

9. Plaintiffs seek to file the two exhibits at issue under seal because Defendant Facebook has designated them as "Highly Confidential – Attorneys Eyes' Only" pursuant to the Stipulated Protective Order, Dkt. No. 122, entered in this Action.

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 12th day of February, 2021 in Davis, California.

/s/ Matthew Montgomery
Matthew Montgomery

CERTIFICATE OF SERVICE

I, Lesley E. Weaver, hereby certify that on February 12, 2021, I electronically filed the foregoing with the Clerk of the United States District Court for the Northern District of California using the CM/ECF system, which shall send electronic notification to all counsel of record. I also caused a copy of the under seal filings to be delivered to all counsel of record via electronic mail.

/s/ Lesley E. Weaver
Lesley E. Weaver